

**STATEMENT OF BASIS (AI No. 140221)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0123536 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Tiger Offshore Rentals  
Intracoastal City  
21793 Highway 33  
Abbeville, Louisiana 70510

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** February 8, 2008

**1. PERMIT STATUS**

**A. Reason For Permit Action:**

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B. NPDES permit - N/A**  
NPDES permit effective date: N/A  
NPDES permit expiration date: N/A

**C. LWDPS permit - N/A**  
LWDPS permit effective date: N/A  
LWDPS permit expiration date: N/A

**D. Date Application Received:** January 2, 2008; the facility submitted the Exterior Vehicle and Equipment Wash Wastewater general permit application; however, this application cannot be used as this general permit does not cover washwater discharges from oilfield service companies.

**2. FACILITY INFORMATION**

**A. FACILITY TYPE/ACTIVITY - oilfield service company**

Tiger Offshore Rentals is an existing oilfield service company that rents various equipment to the oilfield industry including pressure washers. The facility discharges test wastewater from these pressure washers prior to being rented out. There is no equipment cleaning done at the facility.

Statement of Basis for  
Tiger Offshore Rentals, Intracoastal City  
LA0123536, AI No. 140221  
Page 2

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II\*
3. Wastewater Type: III
4. SIC code: 1389

\* This facility has an SIC Code of 1389 with a corresponding Complexity Type of II. However, because of the low volume of test wastewater discharged, the points have been BPJ'ed to 0.

**C. LOCATION** - 21793 Highway 33, Abbeville, Vermilion Parish  
Latitude 29°50'02", Longitude 92°09'11"

**3. OUTFALL INFORMATION**

Outfall 001

Discharge Type: pressure washer test wastewater  
Treatment: sedimentation  
Location: at the point of discharge from the sump  
(Latitude 29°50'02", Longitude 92°09'11")  
Flow: 360 gpd  
Discharge Route: local drainage thence to Bayou Vermilion

Outfall 002

Discharge Type: treated sanitary wastewater  
Treatment: septic tank  
Location: at the point of discharge from the sewage treatment  
plant (Latitude 29°50'02", Longitude 92°09'11")  
Flow: 180 gpd  
Discharge Route: local drainage thence to Bayou Vermilion

**4. RECEIVING WATERS**

STREAM - local drainage thence to Bayou Vermilion

BASIN AND SEGMENT - Vermilion-Teche Basin, Segment 060802

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
d. agriculture

Statement of Basis for  
Tiger Offshore Rentals, Intracoastal City  
LA0123536, AI No. 140221  
Page 3

**5. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

**6. COMPLIANCE HISTORY/COMMENTS**

**A. Compliance History**

There have been no inspections at the facility.

**B. DMR Review/Excursions**

There have been no DMR's as the facility has never had a permit.

**7. EXISTING EFFLUENT LIMITS**

N/A

**8. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 060802 of the Vermilion-Teche Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007, from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

**9. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

**10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

Statement of Basis for  
Tiger Offshore Rentals, Intracoastal City  
LA0123536, AI No. 140221  
Page 4

#### 11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for  
 Tiger Offshore Rentals, Intracoastal City  
 LA0123536, AI No. 140221  
 Page 5

### Rationale for Tiger Offshore Rentals

1. **Outfall 001** - pressure washer test wastewater (estimated flow - 360 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	LPDES General Permit LAG480000
TSS	---:90 mg/L	LPDES General Permit LAG480000
Oil and Grease	---:15 mg/L	LPDES General Permit LAG480000
TOC	---:50 mg/L	LPDES General Permit LAG480000
pH	6.0 - 9.0 s.u.	LPDES General Permit LAG480000

**Treatment:** sedimentation/sump

**Monitoring Frequency:** 1/quarter for all parameters at the point of discharge from the sump

**Limits Justification:** Limits and monitoring frequency are based on LAG480000, Schedule D as the discharges are similar in nature to that of hydrostatic test wastewater (Note: The monitoring frequency will be set at 1/quarter rather than once prior to discharge event based on the low volume of the discharge.)

2. **Outfall 002** - treated sanitary wastewater (estimated flow - 180 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Weekly Avg (mg/l)	<u>Reference</u>
Flow	Report:Report	
BOD <sub>5</sub>	---:45 mg/L	LPDES General Permit LAG530000
TSS	---:45 mg/L	LPDES General Permit LAG530000
Fecal Coliform	---:400 col/100mL	LPDES General Permit LAG530000
pH	6.0 - 9.0 s.u.	LPDES General Permit LAG530000

**Treatment:** septic tank

**Monitoring Frequency:** 1/6 months for all parameters at the point of discharge from the septic tank

**Limits Justification:** LPDES General Permit LAG530000, Schedule B

BPJ Best Professional Judgement  
 su Standard Units

Statement of Basis for  
Tiger Offshore Rentals, Intracoastal City  
LA0123536, AI No. 140221  
Page 6

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water coverage shall not be required in an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).

TMDL/303(d) LANGUAGE

Subsegment 060802, Vermilion River from New Flanders (Ambassador Caffery) Bridge, Hwy. 3073, to Intracoastal Waterway, is not listed on LDEQ's Final 2006 303(d) list as impaired. However, subsegment 060802 was previously listed as impaired for nutrients (Phosphorus, Nitrogen (Nitrate + Nitrite as N)), organic enrichment/low DO (dissolved oxygen), pathogen indicators, suspended solids/turbidity/siltation, and Carbofuran, for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for subsegment 060802:

The Mermentau River and Vermilion Teche River Basins TMDL for the pesticide Carbofuran was finalized on March 21, 2002. Pesticides, which can be attributed to agricultural runoff, are not considered to be discharged from this facility.

Both outfalls from this facility have the potential to discharge pollutants that may contribute to the suspended solids impairment of the receiving stream. As per the TMDL for TSS, Turbidity, and Siltation for the 15

Statement of Basis for  
Tiger Offshore Rentals, Intracoastal City  
LA0123536, AI No. 140221  
Page 7

Subsegments in the Vermilion River Basin, point source loads are so small as to be insignificant, and because effective policies are in place to limit TSS discharges, no specific reductions from point sources are required. Standard TSS limits have been placed on both outfalls to address this impairment.

The treated sanitary wastewater from this facility has the potential to discharge fecal coliform. However, this facility was not considered in the Vermilion River Fecal Coliform TMDL (April 5, 2001), and there will be no change in permit requirements based upon a wasteload allocation resulting from this TMDL. Standard Fecal Coliform limits have been included in the permit that will address the potential for further impairment of this waterbody.

The DEQ TMDL for Vermilion River Oxygen Demand was incorporated into the EPA TMDL Vermilion River Dissolved Oxygen and Nitrogen TMDL (see Federal Register Notice: Volume 66, Number 66, Pages 18087 18089, 04/05/2001). This TMDL did not provide for more stringent limits than those already in place by the Department. Standard BOD<sub>5</sub> limits have been included in the permit and will adequately address the potential to contribute to the organic enrichment/low DO and Nitrogen impairments.

The sanitary discharge has the potential to discharge phosphorus from this facility. Due to the small amount of discharge (estimated 180 gpd), this discharge should not cause or contribute to further impairment of the receiving stream. Since increases in Phosphorus input are inversely related to Dissolved Oxygen (through algal growth and decay), the BOD<sub>5</sub> limit should be sufficient to control Phosphorus inputs to the receiving stream. In addition, as per the February 29, 2000 Delist (Federal Register Notice: Vol. 65, Num. 173, pages 54032 54034, 9/6/2000), assessment of new data and information shows this segment is meeting water quality standards for Phosphorus.